

Public consultation on a Communication on the Citizens Energy Package for a Just Transition and Consumer Empowerment

Fields marked with * are mandatory.

Introduction

The Citizens Energy Package for a Just Transition and Consumer Empowerment is linked to the delivery of the Affordable Energy Action Plan. It aims to help make it affordable and easy for all citizens to benefit from the internal energy market and to ensure a just transition that leaves no one behind. This means accelerating the concrete achievement of the Just Transition goals and to implement on the ground the EU rules and policies on consumer empowerment and protection. It thus aims to help not only those citizens who are already engaged, but also the energy poor and vulnerable and in particular consumers for whom energy is a significant part of their cost of living, but who currently lack the capacity to act on energy markets or actively participate in it.

The Package has a three-fold goal: first, it includes measures to enhance the Just Transition principle that no citizen is left behind; it addresses measures tackling energy poverty and supports the complex process of decarbonising coal regions. Secondly, it encompasses a set of actions to facilitate consumer activation, i.e. to promote citizens' participation in energy production and exchange both individually (as prosumers) and collectively through energy communities and energy sharing. Third, it addresses issues that affects all citizens in respect of the energy transition, in particular the need to ensure energy affordability. This implies to ensure public acceptance by citizens, to better inform them, address barriers to affordability, building a mutual trust relationships with suppliers and DSOs, and enhancing the role of local players and initiatives where the energy transition takes place. The feed-back from respondents will be important for the Commission's work to support the smooth and coherent transposition of EU rules on energy consumers through guidance to the Member States.

The Package will also help deliver the Clean Industrial Deal, fulfilling its commitments and promoting flexible market participation that benefits all consumers. It will be closely linked to the electrification and digitalisation strategies with a focus on ensuring that these are delivered in a consumer-friendly way.

This open public consultation together with targeted consultations on the guidance documents aim to ensure a wide understanding and ownership of the whole Package by key stakeholders – regulators, consumer organisations, industry, local and regional administrations, civil society and citizens. This consultation is thus

complemented by other consultation fora and processes, such as Citizens Energy Forum and the Regulatory Round Table, outreach events to different types of stakeholders, and working groups on consumers and on energy poverty.

We are very much interested in hearing your views on the Citizens Energy Package as described above.

Thank you in advance for your contribution.

*The following questionnaire consists out of 8 parts. It will start with questions on just transition and energy poverty, after which it will dive into questions on affordability and consumer empowerment and protection. **It is not mandatory to respond to all parts, you are free to respond to those parts that are of interest to you.***

The following topics will be part of the questionnaire

Section 1 on Just Transition and Energy Poverty

1. Questions on just transition, energy poverty and public acceptance
2. On disconnections

Section 2 on Consumer Empowerment

3. On energy communities
4. On active customers and energy sharing
5. On demand flexibility remuneration in retail contracts – dynamic and hybrid contracts

Section 3 on Consumer Protection, Affordability and Public Acceptance

6. On ensuring energy offers are easily understandable and comparable
7. On limiting risk of supplier bankruptcies
8. On consumer protection in natural gas phase-out

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German

- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Felix

* Surname

Kriedemann

* Email (this won't be published)

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* Organisation name

255 character(s) maximum

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* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

906602046269-23

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino

- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
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- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria

- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
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- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay

- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
- Saint Kitts and Nevis
- Saint Lucia
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
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- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

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Section 1 on Just Transition and Energy Poverty

1. Questions on Just Transition and Energy Poverty

01. What priority actions are needed at EU, national and local level to ensure that just transition and consumer rights become concrete throughout all the EU Member States?

5000 character(s) maximum

Action at EU level: - Robust Legislative Frameworks: Strengthen and ensure the effective transposition and implementation of EU legislation (e.g. the Clean Energy for All Europeans Package) that empower citizens to form and participate in energy communities, and that place strong obligations on Member States to tackle energy poverty. Ensure that EU directives related to energy communities and energy poverty are not only transposed but also implemented in a way that truly enables and empowers local energy solidarity actions. - Mainstream Energy Citizenship: Integrate the concept of "energy citizenship" more deeply into EU laws and tools, recognizing the right of every citizen to participate in and benefit from the energy transition (both collectively and individually). - Targeted Funding and Support: Provide financial instruments and programs specifically designed to support energy communities' social impact initiatives, including those directly addressing energy poverty and vulnerable consumers. This should also include funding for capacity building and knowledge transfer among ECs, and encourage partnerships with other key stakeholders such as municipalities, energy agencies, farmers and youth organisations. - Facilitate Cross-Border Learning: Promote platforms and initiatives for sharing best practices and successful models of energy solidarity from across Member States, enabling faster replication and adaptation. - Monitoring and Data Collection: Establish consistent EU-wide data collection and monitoring mechanisms to track energy poverty, the impact of energy communities, and the effectiveness of policies related to a just transition and respect for consumer rights.

Actions at Member State level: - National Strategies for Energy Poverty: Develop and implement comprehensive national strategies to combat energy poverty, explicitly recognising the role of energy communities and including measures that protect vulnerable consumers. - Support for Community Energy: Create national support frameworks, including legal, regulatory, and financial mechanisms specifically tailored to help energy communities thrive and deliver social impact. This includes simplified administrative procedures for their formation and operation. Furthermore, dedicated public procurement procedures and renewables support schemes for community initiatives that have an objective to tackle energy poverty should be developed. - Financial Incentives: Create national-level financial incentives such as grants, subsidies, and tax breaks for vulnerable households to adopt energy efficiency measures, and for energy communities to develop and implement energy solidarity projects. - Capacity Building: Provide national programs and resources to train and empower community leaders, local authorities, and organisations to design long lasting energy community initiatives, effectively engage with energy-vulnerable households, and implement energy solidarity initiatives. - Regulatory Sandboxes: Consider creating "regulatory sandboxes" or pilot programs to test innovative energy solidarity models and adjust national policies based on real-world learning.

Actions at local level: - Identification and Engagement: Develop local mechanisms and partnerships with social services, federations of energy communities, NGOs, and community organisations to identify vulnerable households and effectively engage them in energy solidarity programs. - Tailored Support Programs: Implement localised support programs for vulnerable people such as energy cafes, one stop shops, "cosy kits," or home visits for energy advice, that are adapted to the specific needs and contexts of the local people and community. - Community-Led Solutions: Empower and resource local energy communities to design and implement solutions that address energy poverty and promote energy solidarity, recognising their unique understanding of local challenges. - Facilitate Collaboration: Actively foster collaboration between local authorities, energy communities, and other local stakeholders (e.g., financial advisors, health services) to provide holistic support to vulnerable households. For example, local authorities should be supported to develop special public procurement procedures to encourage energy communities that prioritise social inclusion and fighting energy poverty. - Monitor and Evaluate Locally: Regularly monitor and evaluate the impact of local energy solidarity initiatives to demonstrate their effectiveness, secure continued funding, and inform local policy adjustments.

02. What are the main challenges to tackling energy poverty in the EU?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
High energy prices	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective identification of vulnerable and energy poor consumer	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of energy efficiency in housing	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited access to renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Income inequality	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient awareness and education about energy-saving measures and available assistance programs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate financial support schemes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of political will	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Cycles of dependency. Cooperation between different actors. There is a lack of understanding at national, regional, and local level about the impact of energy inequality on citizens living in vulnerable situations. A good practice is to enhance cooperation of a range of actors, particularly at the local level, including authorities, civil society organisations and groups as well as public social and health care services, who have direct contact with people at risk or suffering from energy poverty. Furthermore, DSOs, energy suppliers and smart meters can provide information regarding the delay or interruption of payments by consumers, such as drops in energy consumption, which can serve as a potential sign of self-disconnection. Erosion of redistributive taxation. The inadequate insulation of most homes in Europe.

03. Do you think that, in addition to implementing existing EU legislation, other measures are needed to tackle energy poverty in the EU?

- Yes, new or additional measures (legal or other) are needed at EU level
- No, the focus should be on effectively implementing existing EU legislation on energy poverty with existing tools

If yes: Please elaborate on what measures, other than implementing existing EU legislation, are still needed to tackle energy poverty in the EU

3000 character(s) maximum

04. Would setting mandatory target(s) help Member States address energy poverty?

Yes

No

If yes, please elaborate (e.g. on methodology, indicators, timeframe etc)

5000 character(s) maximum

2. On Disconnections

The energy crisis has exposed already energy poor and vulnerable consumers across the internal market to additional higher energy costs, further eroding their ability to continue paying their energy bills. Legislators have then reinforced the existing legislation on disconnections both for the electricity and gas market, asking Member States to take appropriate measures to prevent disconnections for vulnerable customers and customers affected by energy poverty.

As part of the Package, the Commission will publish guidance on transposition of article 28a of the Electricity Market Directive and Article 28 of the Gas Directive Recast which both legislate on protection from disconnection for vulnerable and energy poor customers.

01. What measure or practice do you consider effective to prevent disconnection from electricity or gas of vulnerable customers and customers affected by energy poverty?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Promoting voluntary codes of conduct or a charter for suppliers and customers <i>(arrangements may concern support for customers in managing their energy use and costs, including flagging unusual high energy spikes or use in winter and summer seasons, offering appropriate flexible payment plans, debt advice measures, self-metering readings, and improved communication with customers and support agencies)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting customers' education and awareness (e.g. through one-stop-shops or advisory points)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to finance, vouchers or subsidies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging and facilitating the provision of meter readings	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted energy tariffs/allowances for vulnerable consumers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Structural measures to address the root causes of energy poverty (e.g., building renovations, energy efficiency measures, access to renewable energy sources, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please, use this space if you wish to point out other effective measures/practices to prevent disconnection from electricity or gas of vulnerable customers and customers in energy poverty

2000 character(s) maximum

Energy providers should be required to offer payment plans before disconnection, including flexible repayment options, deferred payment plans during financial crises, and debt forgiveness for cases of extreme hardship. This is already the case in some Member States, such as Portugal. To support these initiatives, robust monitoring and enforcement mechanisms are essential. An independent regulator should oversee energy suppliers, ensuring compliance with protection rules and imposing fines for unlawful disconnections. Offering free energy audits and efficiency upgrades can help reduce high energy costs by improving the energy efficiency of vulnerable households, lowering their bills in the long term. Activating social intermediaries, such as federations of energy communities, to provide tailored advice and One Stop Shop services, can also help accelerate the uptake of efficiency solutions by households and SMEs. However, to ensure these upgrades reach the most vulnerable, they must be publicly financed, covering upfront costs that many low-income households cannot afford. Special attention is needed to tackle the owner-tenant dilemma, where landlords may have little incentive to invest in energy efficiency improvements while tenants bear the cost of high energy bills. On the other hand, if an apartment is renovated with public subsidies, clear moratoria on evictions and rent-increases should be put in place. Expanding access to collective self-consumption and energy sharing would empower households to generate and distribute their own renewable energy, decreasing dependencies on traditional market actors, and reducing the risk of non-payment. There are already a number of cases where local authorities or energy communities (e.g. cooperatives and associations) provide energy sharing to vulnerable and energy poor households either as a service or through solidarity mechanisms. Facilitating the access to finance for these initiatives could accelerate their uptake.

02. Which actions/measures could be most effective in preventing customers from accumulating debt?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Transparency and clear communication about energy consumption, costs, and payment obligations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regular billing and payment reminders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Flexible payment plans taking into account the customer's income and expenditure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Debt counselling or energy efficiency advice to help consumers manage their energy costs and consumption	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted financial support or coverage/ subsidies/ energy cheques provided by local /regional/national authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please, use this space if you wish to point out other effective measures/practices to prevent customers from accumulating debt

2000 character(s) maximum

In cases of extreme hardship, deferred payment plans, and debt forgiveness should also be considered; Cooperative suppliers undertaking these activities should be backed by public guarantees in order to avoid undue financial pressures on their social activities.

03. Please, share any relevant best practice on protection of vulnerable customers and customers affected by energy poverty from electricity and gas disconnections and from debt accumulation.

5000 character(s) maximum

Kindly find below a non-exhaustive list of examples: - An agreement was entered into between the Generalitat de Catalonia (regional government) and Endesa, which included writing off vulnerable households' outstanding debt between 2015 and 2020; - ESEK, an energy community in Greece, provided free renewable energy to its region's vulnerable households (e.g., donation of biopellets to a local kindergarten for sustainable heating). - The energy community, Les7Vents in France, received a subsidy from the government to renovate the homes of the most vulnerable citizens, while also offering them social services (or creating a link between these citizens, and existing social services). - There are many energy communities working on providing services to energy poor households in Flanders. For instance, PowerUp spreads buying cooperative shares, so that access to renewable energy at cost price can start without the burden of buying shares. Ecobouwers and EcoOb finance solar panels for vulnerable households with citizen capital. These households pay this back in monthly fees at the pace they consume the solar energy (no additional costs). Klimaan (Otterbeek) installs solar panels on social houses, with repayment through reduced prices for the energy produced from the panels. Klimaan Pandschap Rivierenland renovates houses of private owners, and offer affordable shared mobility. SAAMO Papillon rents out energy saving household appliances (eg. Fridges).

Section 2 on Consumer Empowerment

3. On Energy Communities

Energy communities are legal entities that empower citizens, small businesses and local authorities to produce, consume and sell their own energy. These can cover various parts of the energy value chain, including production, distribution, supply, consumption and aggregation. These vary depending on their location, actors and energy services. Energy communities enable citizens to access low-cost renewable energy by owning production installation, and access information on increasing energy efficiency in households – helping consumers gain control of their bills. Energy communities benefit from an EU framework in the Electricity Market Directive (EU) 2019/944 and Renewable Energy Directive (EU) 2018 /2001).

01. How can the Commission support the realisation of the objectives of energy communities?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Awareness raising	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capacity building support	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Funding	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

-Enforce existing EU legislation on energy communities: Member States still struggle with the correct implementation of energy communities legislation, leading to corporate capture, misuses of public funds, or a lack of an enabling framework. Establish an EU level information exchange mechanism between the Union's institutions, national governments, and federations of energy communities, aimed at supporting national authorities in their implementation of community energy legislation. -Strengthen the use of non-price criteria in EU public procurement legislation: Municipal councils in Belgium voted on a resolution requiring all energy production installations on municipal land to offer 50% of its capital to investments by local citizens. -Introduce a community right to co-invest in local renewable energy production projects into EU legislation. In the Netherlands, the Klimaatakkoord (2020) encourages new onshore wind and solar PV projects to include a 50% participation component in their capital. -Strengthen the Electricity Directive to guarantee access to the grid for local energy community projects: National Energy Regulators and system operators should be required to ringfence a certain amount of grid capacity for local energy community production installations, to ensure there is available space for citizen-led renewables. -De-risk citizen investments: Create a guidance document on the de-risking of energy community projects, many citizen-led initiatives are not able to access bank loans at reasonable rates or timeframes. Energy communities bring x2 to x8 times more economic benefits to their local area than projects by other actors (Energie Partagee 2019; Universität Kassel 2023). -Work with national regulators (e.g. ACER) to ensure an equal playing field and reduce disproportionate market, regulatory and administrative barriers so that citizen initiatives do not face unfair financial charges, responsibilities or administrative procedures.

02. Would you find it useful if the Commission provides guidance to the EU Member States on the following:

Maximum 6 selection(s)

- Permitting and licensing
- Access to financing and information
- Access to markets

- Public procurement
- Other
- None of the above

Please explain your answer.

1500 character(s) maximum

-Enabling frameworks for energy communities. In particular, there is a need to provide guidance to Member States on how they can implement their commitments under Article 22 of the Renewable Energy Directive around assessing potential and barriers for energy communities at the national level, and putting in place policies and measures that are required when putting in place a framework to promote and facilitate the development of renewable energy communities. -Definitions of energy communities to stop the corporate capture trend that slows the roll-out of citizen-led initiatives. -Guidance on the establishment of secondary structures for energy communities: Secondary structures such as federations of national energy communities aid the implementation of community projects, protect against corporate capture, and facilitate the contact between local projects and the national government bodies.

03. Are there any good practices that you think would be useful to highlight in such a guidance?

5000 character(s) maximum

- OSR-Coop project's 'Guidance Manual' and online course on 'Delivering citizen-led renovation through one-stop shop cooperatives' - COMPILE project's Compile 'Public Procurement Guide' & 'Municipal Guide' - ACCE project's 'RES Project Development Guide' - REScoop.eu financing tracker - REScoop.eu 'Guidelines on Community-led Heating and Cooling' - CEES Energy Solidarity Toolkit - Association des Centrales Villageoises, Annual Activity Report 2024 - EWS Schoenau, activity reports, as well as their collective fund (Sonnencent) for community energy and citizen education - REScoop.eu 'Community Energy: A Practical Guide to Reclaiming Power' - European Citizen Energy Academy 'Best Practice Guide for Southeast Europe' - REScoop.eu 'Community Energy Communications at the local level' - REScoop.eu 'Energy Communities Transposition Guidanceelines' - Life COMET project's The 'National Community Energy Coalitions Report' (from the COMET project, if useful) - Energy Communities Repository Report on 'Barriers and Action Drivers for the Development of Different Activities by Renewable and Citizen Energy Communities' - Energy Communities Repository Report on 'A Roadmap to Developing a Policy and Legal Framework that Enables the Development of Energy Communities' - Energie Partagée's studies Study on the social impact of energy communities by Energie Partagee(L'énergie citoyenne, qu'est-ce que ça change ? March 2023); and ons well as the economic benefits of energy communities (Les retombées économiques locales des projets citoyens, December 2019).

04. Would you find it useful if the Commission includes a political objective in the Communication in relation to:

(Select topics you agree with)

Maximum 5 selection(s)

- Number of energy communities per municipality
- Total installed renewable energy capacity by energy communities
- Number of citizens engaged in energy communities

- Other
- None of the above

Please explain your answer.

1500 character(s) maximum

REScoop.eu fully endorses the adoption of an EU-level political objective that can serve as a guiding post for how the EU could empower energy communities in its energy transition. We recommend a combination between total installed renewable energy capacity, and number of citizens engaged in energy communities through ownership. Installed capacity can be a good benchmark for measuring the ability of energy communities to contribute to the rollout of renewable energy across Europe. However, energy communities were primarily developed to enable citizens to participate in Europe's energy transition. As such, it is essential to ensure that the rollout of energy communities is staying true to this original purpose. As such, this political objective should aim at a certain number or percentage of citizen ownership through energy communities.

4. On Active Customers and Energy Sharing

With the introduction of a right to energy sharing in the Electricity Market Directive (EU) 2024/1711, households, businesses and public bodies can share self-produced renewable energy directly between each other without the need for a supply license. This practice empowers consumers to collectively operate or use renewable energy systems and access the generated electricity at affordable rates.

01. In relation to energy sharing, would you find it useful if the Commission provides guidance on:

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Data management	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumer protection	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Single point of contact	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy sharing organisor	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Involvement of energy poor and vulnerable households	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

- Operating models for energy sharing business cases, including for non-profit legal entities. - How to address energy poverty through energy sharing, including supporting different business models (e.g. municipal, energy community), as well as how to protect vulnerable households with additional tariff protection when they engage

in energy sharing so they do not lose access to social benefits. - Stakeholder mobilisation guide. - Rules on registering an energy sharing initiative and rules on obtaining grid connections. - How to apply supply license exemptions for energy sharing initiatives. - Guarantee solutions for energy sharing business models that need a bank loan and only rely on consumers' energy contracts. - How to incentivise energy sharing so that production can be more closely connected with time of use (optimisation) at times when it can be beneficial to the grid (e.g. relieving congestion).

02. Are there any good practices that you think would be useful to highlight in such a guidance?

5000 character(s) maximum

Greek law allows for energy communities to include vulnerable households, for free, in their collective self-consumption projects, even if these households are not members of the energy community. This reduces financial and bureaucratic costs for vulnerable households, who can simply benefit from reduced energy prices, while the community handles the rest.

03. Do you consider there is a need for an implementing act on data interoperability for energy sharing?

- Yes
- No

5. On Demand Flexibility Remuneration in Retail Contracts - dynamic and hybrid contracts

Demand flexibility should be actively promoted in the retail market with offers that provide lower prices for industries, and consumers who choose to participate. As part of its commitment to energy affordability and flexible market participation, the Affordable Energy Action Plan mandates the Commission to develop guidance for promoting the remuneration of flexibility in retail contracts. This aims to boost consumer engagement by incentivising adjustments in energy usage that align with supply and demand dynamics. To ensure broad participation, it is important that these incentives are clear, understandable, and financially attractive for consumers to opt in. Furthermore, increasing consumer participation involves providing them with a range of choices and equipping them with the necessary tools and information to make educated decisions about their energy behaviour, thereby safeguarding their interests as they navigate an increasingly complex energy market.

01. What do you consider as benefits and challenges regarding the integration of demand flexibility into the retail energy market through flexible supply contracts (e.g., hybrid, dynamic pricing, time-of-use contracts)?

(Please rate according to importance)

Benefits - Challenges	Very important	Important	Neutral	Less important	Not important	No opinion

<u>Benefit:</u> Lower electricity costs for consumers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> More efficient management of the system and lower prices overall	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Better integration of renewable energy sources	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Improved grid stability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Increased consumer engagement and awareness, leading to better energy management	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Lack of smart metering infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Insufficient regulatory framework	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Lack of standards or guidelines for dynamic or hybrid energy supply contracts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Absence of dynamic or hybrid energy supply contracts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Inconsistent regulatory approaches and national practices across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<u>Challenge:</u> Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Benefit: For 'Other', please specify:

2000 character(s) maximum

Challenge: For 'Other', please specify:

2000 character(s) maximum

Challenge: Ensuring digital literacy is accessible to all segments of society (e.g., migrants, elderly citizens). This may be achieved by enhancing the role of trusted intermediaries like (local) energy agencies to provide clear information. Challenge: Ensuring that smart devices are standardised and made interoperable across manufacturers, and that affordable devices are available to ensure widespread adoption. Challenge: How to protect vulnerable consumers from extreme fluctuations in energy prices, as they have no liquidity to be able to absorb sudden costs.

02. What measures or actions are most important for promoting demand flexibility in retail markets?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Offering financial incentives or rewards for consumers participating in demand flexibility programmes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing user-friendly digital tools and platforms for real-time energy management	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing the access to smart meter data and automation to support flexible consumption	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring that the regulatory frameworks support fair remuneration of flexibility and consumer protection	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing regular, transparent communication about the benefits and risks of flexible supply contracts, alongside educational campaigns to improve consumer awareness and understanding of such contracts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating collaboration between different stakeholders to ensure an efficient and competitive flexibility market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

National regulatory frameworks for energy flexibility should take into account the role of energy communities. This includes their potential for peer-to-peer advice, mentoring, and behavioural shifts. It also includes collective procurement of smart devices, and most importantly the potential of energy communities to act as aggregators. In particular, energy communities may play a key role to support grid congestion management if the right incentives are in place (esp. related to energy sharing). Support should thus be provided so that they can participate in flexibility markets on an equal footing.

03. What measures or commercial practices could be in place to protect consumers from excessive risks associated with price volatility in flexible supply contracts?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Introducing price limits to contain costs during excessive price peak periods	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Offering hybrid contracts that blend fixed and dynamic pricing for balance and predictability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring availability of 'safety net' features such as guarantees or insurance against price spikes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promoting access to real-time consumption data through smart meters to enable informed usage decisions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementing clear, simple, and accessible contract terms and conditions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing comprehensive information of the opportunities, costs and potential risks, and applying techniques to identify final customer's preferences (e.g. risk profile assessment)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Offering comparison tools that help consumers evaluate different contract options	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging the development of risk-sharing mechanisms between consumers and suppliers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

- Offering One Stop Shop services to citizens, in collaboration with locally embedded social partners (e.g., energy communities, consumer rights associations, federations of energy communities), to provide bespoke advice (e.g., on contract types), and help citizens access funding (e.g., for the procurement of smart devices). - Introducing a mandatory warning notice, when subscribing to a flexible contract, informing consumers on the high prices they may be exposed to.

Section 3 on Consumer Protection, Affordability and Public Acceptance

General questions

01. What actions are needed at EU, national and local level and by whom to raise awareness about consumer protection, rights and opportunities for consumers to engage in the energy transition? Are you aware of any good practices?

5000 character(s) maximum

To effectively raise awareness about consumer protection, rights, and opportunities for engaging in the energy transition, a key element that should be emphasized is the role of secondary structures or umbrella energy community organisations (namely, federations, coalitions or energy communities). These structures play a vital role in advancing community energy across Europe. They bring together relevant actors, champion inclusive and democratic energy systems, and work at national and local levels to reduce legal, financial, and technical barriers for citizens to actively take part in the energy transition. They also enable access to information, tools, resources, and financing that individuals and communities often lack. Their bottom-up, member-led nature allows them to respond to national contexts while preserving citizen ownership and democratic governance. At the EU level, stronger support is needed to establish and reinforce national federations and coalitions in all Member States. The EU should ensure all Member States recognise them as key enablers of citizen participation in the energy transition. At the Member State level, national and regional governments must involve secondary structures of energy communities in policy discussions on energy communities, energy sharing, consumer rights, and citizen participation and provide stable and accessible support schemes that allow them to offer tailored services, technical assistance and access to financing for their members. Across Europe secondary structures of energy communities have set up partnerships with specific regions to run dedicated One Stop Shops, providing expertise and technical assistance to energy communities. The most prominent example originates from France. Specifically, four French regions have used the ERDF to provide structural funding to regional support networks of Energie Partagée (the French federation of energy

communities). These regional networks provide on-the-ground technical assistance and capacity building to (starting) energy communities. Individual community energy expert organisations such as La Palma Renewable in Spain, and Ecovision in Ireland, have also set up dedicated One Stop Shops to help energy communities access capacity building and funding opportunities. These One Stop Shops should be used to provide consumers with dedicated advice on contract types, energy efficiency interventions, funding opportunities, and ways to create or join an energy community.

02. Are there any specific areas (e.g. clarity of energy bills, unfair commercial practices, peer-to-peer trading) where you believe the EU could further focus to increase consumer protection and engagement in the energy market? If so, which areas should be prioritised?

5000 character(s) maximum

03. Do you think that additional measures are needed to enhance public acceptance of renewables in the EU?

- Yes, new or additional measures are needed.
- No, existing rules and recommendations are sufficient and it is more important to focus on their implementation.

Should the additional measures be:

- Legislative
- Non-legislative

04. What type of interventions would be more effective in involving citizens and enhancing public acceptance of renewables in your view?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Indirect financial participation (benefit sharing) e.g. job creation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct financial participation e.g. buying stakes in the project, financing for local communities (municipalities, citizens)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting communities' participation in renewable energy projects e.g. through the inclusion of measures to foster public acceptance in renewables auctions criteria	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication measures e.g. education and information campaigns	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Early engagement of citizens and involvement in the decision-making process	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

-EU obligation for private industrial renewable energy projects to offer ownership shares to local communities. This need not equate to a requirement of result. Rather, it should provide the community the right to choose to co-invest in the project, or to choose another form of benefit sharing. The key is that the developer would be required to allow members of the local community, such as energy communities and local authorities, to exercise this right. To ensure investment certainty both for developers and local communities, local and regional authorities should be encouraged to adopt local renewable energy development policies and objectives that provide the basis for co-investment. Such policy objectives have been developed in Belgium, Germany. - Inclusivity plan to involve as many community members as possible, paying special emphasis on reaching out to local communities with low political involvement. Consider that citizens may engage to different degrees, with some being able to devote more time and resources than others. -Offer citizens public spaces to organise meetings. -Foster the creation of local community engagement working groups. -Develop a valorisation roadmap to ensure that the engagement of citizens translates into value for economy and society, including the resources required to generate societal and economic impacts. -Include a monitoring and evaluation framework, for assessing the societal and economic value derived from the citizen engagement process. - Recognise everyone's contribution to the results, by defining clear ownership provisions, including in presentations, scientific publications, manuscripts, and descriptions of final results and products; -Adopt an open access approach when appropriate to foster the reusability of the results; -Ensure that privacy, confidentiality and ethical principles are upheld in the management of intellectual assets, particularly when dealing with data and the dissemination and sharing of results

05. What do you believe are the main retail challenges for affordable energy in your Member State?

Maximum 3 selection(s)

- High retail prices
- Limited access to renewable energy options
- Lack of (competitive) offers
- Lack of access to smart solutions (e.g. smart meters, smart appliances and/or aggregators)
- Lack of information or awareness about energy-saving options
- Other

For 'Other', please specify:

2000 character(s) maximum

6. Ensuring energy offers are easily understandable and comparable

Due to the increasing complexity of energy offers, consumers often find it difficult to fully understand the implications of suppliers' offers. Therefore, they should be provided with a summary of the key contractual

terms and conditions in a prominent manner and in clear and concise language. The European Commission was tasked to provide guidance to Member States on a summary of the key contractual terms and conditions in both electricity and gas markets.

01. What are the key principles that should guide the presentation of energy offers to ensure consumers receive all necessary information in a user-friendly format and in a timely manner?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Clear and simple language	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Visually appealing design and layout	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Timely presentation of information	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Easy comparison of different energy offers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Personalization of information to individual consumer needs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessibility of information across different communication channels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of concise and straightforward terminology	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Take into account different needs experienced by different groups. Poverty varies within different social groups. Young parents for example have high energy needs, while older single people also have needs that should be respected.

02. Which is the most important information on an energy offer that should be prominently displayed to consumers?

	Most important information on an energy offer?
1	The hourly price that the consumer will pay
2	
3	
4	
5	

03. Have you identified good practices regarding a summary of key contractual terms and conditions and/or other tools providing consumers with information on energy offers in a user-friendly format allowing easy comparison? Please elaborate.

5000 character(s) maximum

7. On Limiting Risk of Supplier Bankruptcies

'Supplier Hedging' relates to the purchasing strategy of suppliers on the wholesale market. When suppliers do not ensure that their electricity portfolio is sufficiently hedged, changes in wholesale electricity prices can leave them financially at risk and can result in their failure and them passing on costs to consumers and other network users. Hence, suppliers should be appropriately hedged when offering fixed-term, fixed-price electricity supply contracts. In short, suppliers need to buy the electricity provided to you sufficiently in advance to protect against price hikes.

Article 18a of Directive 2024/1711 aims to ensure that National Regulatory Authorities enforce that suppliers have in place and implement appropriate hedging strategies.

01. Which elements of article 18a EMD are important to clarify further?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Definitions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal implementation Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementation/enforcement National Regulatory Authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further considerations on types of risks for suppliers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Best practices by NRAs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other elements or comments you think are important to highlight? Please elaborate.

2000 character(s) maximum

Ensuring accessibility of hedging products for citizen and renewable energy communities and putting in place enabling conditions. Energy communities engaging retail supply need to be able to meet hedging requirements in a flexible manner that is consistent with their inherent characteristics as non-commercial market actors whose main aim is supply and use their own production to meet their members' consumption needs at the lowest possible cost. Energy community suppliers adopt different hedging strategies, such as securing own-production to protect their consumer-members. Due to their small size, cooperative suppliers also often experience difficulty financing guarantees necessary to trade on wholesale and forward markets. National regulators need to assess what impact hedging requirements will have on energy community supplier business models. In many Member States, power purchase agreements (PPAs) are not easy for energy communities to enter into. As such, where such market dynamics exist, and PPAs are being considered as a hedging requirement, relevant impacts on energy communities need to be assessed. Alternatively, measures could be put in place, such as State-backed guarantees, so that energy communities can have easier access to concluding PPAs. Many national energy regulators are still learning about the unique characteristics of energy communities, guidance in this regard would be helpful. Such guidance should include different examples of how energy community suppliers hedge themselves, potential barriers to various hedging products that regulators should look out for, and potential and existing enabling measures to help energy communities access different hedging products.

8. On Consumer Protection in Natural Gas Phase-out

Phasing out the use of natural gas in the household sector may be part of national, regional or local energy transition plans. If this is the case the consumers and especially energy poor and vulnerable consumers, need to be protected and supported to ensure that they do not suffer negative consequences. In accordance with the requirements of article 27 of the recast EU Directive on gas and hydrogen markets (2024/1788), the Commission is preparing guidance on principles and good practices that would apply after a decision has been made, in order to make the process of a natural gas phase-out consumer-focused, just and inclusive.

01. What are the main concerns for households when phasing-out natural gas?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Lack of alternatives to natural gas for heating and cooking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Higher energy bills	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of financial resources to invest in alternative heating sources	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of access to funding or financing	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inconvenience of works for renovation and/or installation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Uncertainty/absence of national/regional/local plans and timelines for phasing out natural gas	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of information on plans and concrete actions to take	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No availability of companies or workers for the installation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action for a rented home	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action in a multi-apartment building	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Please use this space if you wish to elaborate on the main concerns you have identified (explanations, suggestions, etc.)

2000 character(s) maximum

02. What types of support will be essential for citizens, notably vulnerable customers and customers affected by energy poverty, to assist them in the phase-out of natural gas in their homes?

	Very important	Important	Neutral	Less important	Not important	No opinion
Clear and comprehensive information (what to do)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Practical advice (how to do it)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial advice (how to pay for it)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial support (grants, subsidies, loans, etc)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fully developed packages of solutions (someone does it for you)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to bundle individual projects for joint purchasing or contracting (do it together to get a better deal)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Citizens should receive clear, transparent, and accessible information about the natural gas phase-out, including a well-defined timeline outlining key milestones. This information should detail both short- and long-term costs and benefits at both individual and community levels, helping households understand how the transition will impact them financially and practically. Additionally, tailored guidance should be provided on available support measures, such as financial incentives, renovation programs, and technical assistance for

switching to renewable alternatives. Providing citizens with multiple opportunities to participate—whether through community energy projects, local consultations, or direct incentives—can enhance public support and facilitate a smoother transition away from natural gas. Particularly encouraging community-led heating and cooling projects (as is the case in The Netherlands and Denmark). The Social Climate Fund and the Just Transition Fund are key financial instruments to ensure a fair and inclusive natural gas phase-out, particularly for energy-poor and vulnerable households. These funds should prioritise investments in structural solutions, such as community-led renewable projects, collective self-consumption schemes, and access to renewable heating and cooling alternatives. Additionally, State Aid and Green-Social Procurement can be leveraged to direct public funding toward projects with strong social and environmental benefits, ensuring long-term affordability and sustainability. Financial support should focus on preventive measures rather than short-term relief. Minimising bureaucratic barriers is also essential, as excessive administrative complexity can delay or even discourage citizen-led projects. Streamlining permitting procedures and regulatory requirements would enable energy communities—many of which rely on volunteer efforts—to scale up their impact more efficiently.

03. Do you know of best practice examples where natural gas has already been phased out with a focus on consumers such as by involving consumer collectives, consumer organisations, national or local administrations, energy regulatory authorities, or other local actors? If yes, please describe briefly.

3000 character(s) maximum

Community-led Heating and Cooling (CH&C) initiatives: REScoop.eu recently carried out a study among its members (energy communities) to gauge the prevalence of citizen-owned thermal energy installations. We found that there are over 650 community-led renewable heating and cooling installations by energy communities (existing and in development). There are over 1.900.000 connections to a citizen-owned heating and cooling system (heat pump or district heating), with a cumulative output of 38.7 GWh/year. It is unknown to us how many of these households were connected to the gas network, however it is safe to assume that energy communities have helped hundreds of thousands of European homes to transition away from fossil to renewable heating. REScoop.eu has shared the results of this study with DG ENER.

Contact

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